

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

<b>TAYLOR ENERGY COMPANY LLC,</b>	*	<b>CASE NO. 16-12C</b>
<b>Plaintiff,</b>	*	
<b>VERSUS</b>	*	<b>JUDGE NANCY B. FIRESTONE</b>
	*	
<b>THE UNITED STATES OF AMERICA,</b>	*	
<b>Defendant.</b>	*	
*   *   *   *   *   *	*	

**TAYLOR ENERGY COMPANY LLC’S MOTION TO CONVERT  
TELEPHONIC STATUS CONFERENCE TO IN-PERSON STATUS CONFERENCE**

**NOW COMES**, Taylor Energy Company LLC (“Taylor Energy”), through undersigned counsel, which respectfully requests that the Court convert the telephonic status conference currently set for Monday, March 25, 2019 at 10:30 a.m. eastern time into an in-person conference on Monday, March 25, 2019 at 10:30 a.m. eastern time. For the following reasons, and in the interests of judicial efficiency, good cause exists for granting the relief requested herein.

**I.**

By Order dated March 5, 2019 the Court scheduled a telephonic status conference in the above captioned case for Monday, March 25, 2019 at 10:30 a.m. eastern time. ECF No. 99. In said Order the Court indicated that the “parties should be prepared to discuss whether the doctrine of primary jurisdiction remains applicable.” *Id.*

**II.**

Additionally, by Order dated March 14, 2019, the Court indicated that the parties should be prepared to discuss additional specific questions. ECF No. 100.

III.

Based on the Court's questions and the substantive content of the matters to be addressed, Taylor Energy believes that in the interest of judicial efficiency and justice, the status conference should be held in-person as opposed to by telephone. Taylor Energy avers that it would be beneficial to the Court for the parties to address the Court's questions in-person, and hereby requests that the telephonic status conference be converted to an in-person conference.

IV.

Undersigned counsel attempted to obtain the position of defendant's counsel on this Motion. As of the filing of this Motion, no response has been received.

**WHEREFORE**, for the foregoing reasons, and in the interests of judicial efficiency, Taylor Energy requests that the Court convert the currently scheduled telephonic status conference to an in-person status conference.

Respectfully submitted this 15<sup>th</sup> day of March, 2019.

*s/Carl D. Rosenblum*

CARL D. ROSENBLUM, T.A.

ALIDA C. HAINKEL

LAUREN C. MASTIO

Jones Walker LLP

201 St. Charles Avenue, 49th Floor

New Orleans, Louisiana 70170-5100

Telephone: (504) 582-8000

Facsimile: (504) 589-8296

crosenblum@joneswalker.com

And

PAUL A. DEBOLT

Venable LLP

600 Massachusetts Avenue, NW

Washington, D.C. 20001

Telephone: (202) 344-4000

**Attorneys for Plaintiff,**

**Taylor Energy Company LLC**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 15<sup>th</sup> day of March, 2019, a true and correct copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record participating in CM/ECF by operation of the court's electronic filing system.

/s/ Carl D. Rosenblum